National Grid

National Grid USA Service Company, Inc.

Paul Richards
Principal Environmental Engineer

December 30, 2003

Dr. Thomas French
MA Natural Heritage & Endangered Species Program
MA Division of Fisheries and Wildlife
Route 135
Westborough, MA 01581

RE: Species and Habitat Data
King St. to Mill St. Electrical
Right-of-Way and Substation

Dear Dr. French:

As a follow-up to my letter dated August 8, 2003 and your response letter dated October 31, 2003, Massachusetts Electric (MEC) is proposing a minor fence expansion to the existing King Street Substation (Groveland) and adding a new 23 kV electric line to an existing 1.6-mile right-of-way in Groveland and Georgetown. Your response to our data request identified several species associated with estimated habitat(s) around the substation and western portion of the right-of-way, and two certified vernal pools on or near the right-of-way slightly to the east (north of Pentucket Pond).

In response, MEC engaged Hyla Ecological Services to reconnoiter the right-of-way in light of the construction activities planned for the right-of-way (build a new 23 kV wood pole line to serve summer 2004 peak load). Hyla was asked to look for habitat and to assess, to the extent possible, potential impacts to habitat. Their analysis is enclosed in a report entitled "*Rare Species Wildlife Habitat Assessment of the Proposed Second King Street to Mill Street 23 kV Line Project, Groveland and Georgetown, MA*".

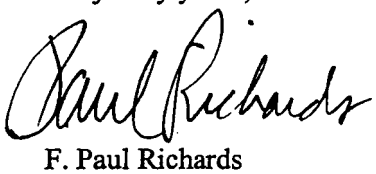
MEC used the Hyla report to place the proposed second 23 kV line in the context of our requirement to serve the "public convenience and necessity" as a regulated public utility. Our filing with the Department of Telecommunications and Energy (DTE) is directed to that requirement.

The MEC submittal for the Program's consideration is entitled "*Massachusetts Electric Company, Second 23 kV Subtransmission Line, King Street (Groveland) to Mill Street (Georgetown), Relative to Natural Heritage & Endangered Species Program Issues*". In this document MEC presents its position regarding electric line construction and rare species protection. MEC will utilize the services of Hyla and Hyla-trained staff to assure that the project can be constructed with insignificant impact to the habitat.

Please note that MEC has filed Notices of Intent with the Groveland and Georgetown Conservation Commissions. Also due to the uncertainty of whether a Massachusetts Environmental Policy Act (MEPA) Environmental Notification Form (ENF) would be required, as a "taking" determination could not be made in a timeframe consistent with the Project's schedule, MEC filed an ENF to keep the project on schedule.

We hope to meet with you personally in the very near future to discuss our project. We hope that the program issue orders that will jointly protect the resource as practical while allowing this necessary, public service project to be completed on time.

Very truly yours,



F. Paul Richards

Enclosures

CC: A. Molina, B. Windmiller, T. Sullivan, G. Danek, and M. Hall

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Commonwealth of Massachusetts

Division of Fisheries & Wildlife

MassWildlife

Wayne F. MacCallum, *Director*

October 31, 2003

F. Paul Richards
National Grid USA
55 Bearfoot Road
Northborough, MA 01532

Re: King St. to Mill St. Electrical ROW and Substation
Georgetown and Groveland, MA
NHESP File: 03-12719

Dear Mr. Richards,

Thank you for contacting the Natural Heritage and Endangered Species Program (NHESP) of the MA Division of Fisheries & Wildlife (DFW) for information regarding state-protected rare species in the vicinity of the above referenced site. I have reviewed the site and would like to offer the following comments.

Based on the project boundaries as delineated on the locus map you provided, the site occurs partially within Estimated Habitat WH 7/Priority Habitat PH 17, and is adjacent to WH 7421/PH 36 as indicated in the 11th Edition of the Massachusetts Natural Heritage Atlas. Our database indicates that the following protected rare species occur within these Habitats in the vicinity of the site:

Scientific name	**Common Name**	**Taxonomic Group**	**State Rank**
Notropis bifrenatus	Bridle Shiner	Fish	SC
Ambystoma laterale	Blue-Spotted Salamander	Amphibian	SC
Hemidactylium scutatum	Four-toed Salamander	Amphibian	SC
Clemmys guttata	Spotted Turtle	Reptile	SC
Emydoidea blandingii	Blanding's Turtle	Reptile	T
Enallagma laterale	New England Bluet	Damselfly	SC
Sparganium natans	Small Bur-reed	Vascular Plant	E

These species are protected under the Massachusetts Endangered Species Act (M.G.L. c. 131A) and its implementing regulations (321 CMR 10.00) as well as the state's Wetlands Protection Act (M.G.L. c. 131, s. 40) and its implementing regulations (310 CMR 10.00). Fact sheets for many of these species can be found on our website at www.state.ma.us/dfwele/dfw. In addition, Certified Vernal Pools # 1932 and 2786 occur in the vicinity of the site. Please contact the Georgetown Conservation Commission for information on these vernal pools.

Division of Fisheries and Wildlife
Field Headquarters, One Rabbit Hill Road, Westborough, MA 01581 (508) 792-7270 Fax (508) 792-7275
An Agency of the Department of Fisheries, Wildlife & Environmental Law Enforcement

This evaluation is based on the most recent information available in the Natural Heritage database, which is constantly being expanded and updated through ongoing research and inventory. Should your site plans change, or new rare species information become available, this evaluation may be reconsidered.

Using the list of rare species provided above, we recommend that rare wildlife and/or plant surveys be conducted by qualified individuals within suitable habitats on and near the site according to scientifically accepted survey methodologies. A Rare Animal/Plant Observation Form, available at our website www.masswildlife.org, should be submitted for each species encountered. If during this site evaluation rare species are found on or near the site, then site plans and a project description should be sent to NHESP Environmental Review to determine whether a probable "take" under the MA Endangered Species Act (G.L. c. 131A) would occur. If NHESP determines that the proposed project would "take" a rare species, and the site is greater than two acres, and within a Priority Habitat site, an Environmental Notification Form should be submitted pursuant to the MA Environmental Policy Act regulations (301 CMR 11.03(2)(b)(2)). If the project site does not occur within a Priority Habitat, but rare species have recently been found on or near the site, then site plans and a site description should be submitted for MESA review. A Conservation & Management Permit may be required for work in rare species habitat.

If the project site is within Estimated Habitat for Rare Wildlife and a Notice of Intent (NOI) is required, then a copy of the NOI must be submitted to the NHESP in a timely manner, so that it is received at the same time as the conservation commission. Using the species list provided above, the Resource Areas on the site should be evaluated as important wildlife habitat for state-protected species, focusing on those areas that provide feeding, breeding, over-wintering, shelter and migration functions. The project should be evaluated for compliance with the rare species performance standard, which is that there shall be no short or long-term adverse affects to the habitat (within Resource Areas)(310 CMR 10.37 and 10.59).

If you have any questions regarding this review, please contact Tom French, Assistant Director, at ext. 163.

Sincerely,

Thomas W. French

Thomas W. French, Ph.D
Assistant Director

December 30, 2003

Rare Species Wildlife Habitat Assessment of the Proposed Second King Street to Mill Street 23 kV Line Project

Groveland and Georgetown, MA

Prepared for:

Paul Richards
Principal Environmental Engineer
National Grid USA
55 Bearfoot Road
Northborough, MA 01532

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Commonwealth of Massachusetts
Division of Fisheries and Wildlife
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Prepared by:

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Principal – Senior Wildlife Biologist

1 – Introduction

Massachusetts Electric proposes the addition of a 23 kV electric line to an existing 1.6 mile right-of-way in the towns of Groveland and Georgetown, MA. The majority of the proposed line is contained within Estimated Habitat for Rare Wildlife and Priority Habitat of Rare Species (WH 7/ PH 17) and is adjacent to WH 7421/ PH 36, Pentucket Pond. Six rare animal and one plant species are potentially located in the vicinity of the project, as identified by the Massachusetts Natural Heritage and Endangered Species Program (NHESP):

- Bridle Shiner (*Notropis bifrenatus*)
  Blue-spotted Salamander (*Ambystoma laterale*)
  Four-toed Salamander (*Hemidactylium scutatum*)
- Spotted Turtle (*Clemmys guttata*)
- Blanding's Turtle (*Emydoidea blandingii*)
- New England Bluet (*Enallagma laterale*)
- Small Bur-reed (*Sparganium natans*)

To address the potential impact to these species from the proposed electric line Hyla Ecological Services, Inc. (HES) was retained by Massachusetts Electric to conduct a wildlife habitat assessment of the proposed line, including mapping the likely extent of actual habitat for the indicated species.

1.1 - Project Description

The proposed line will be located within an existing cleared right-of-way (ROW) and will run alongside an existing 23 kV line. A total of 38 new poles will be installed, located 12-20 feet from existing poles. Pole installation will require temporary impact to a surface area of only about 10 ft^2 per pole, with topography restored immediately after installation. A small number of poles will require guy lines for extra stability, these will consist of "Manta Ray" anchors in wetlands and screw anchors in uplands which are easily inserted with minimal disturbance required.

The majority of the existing ROW is accessible by an 8-10 foot wide dirt access road, sufficiently wide for any vehicles needed in the construction. New individual poles will be accessed by short, usually perpendicular, pathways connected to this main access road. Because the work will be done in an existing ROW, only minimal tree removal will be required, and overall disturbance to vegetation will be minor. Most of the wetlands on the ROW will be spanned by the electric line and will not be crossed by vehicles. After pole installation, pilot lines used to pull the wires will be walked through the wetlands.

2 - Methods

We visited the entire length of the proposed line and identified specific areas where potential habitat for any of the rare species may be impacted by the activities involved in the construction, including both wetlands and uplands. Additionally, we were shown the

exact locations (within 5-10 feet) of each proposed pole along the new line by the project's Senior Project Engineer. Using a differentially-corrected GPS receiver, we mapped the rare species habitat potentially impacted at each of these areas in relation to the existing pole, the proposed pole, and the access path required to install the poles. Specifically, we searched the area for any microhabitats that meet the requirements of nesting Four-toed Salamanders (e.g. thick *Spagnum* moss within shallow wetlands) and nesting Spotted or Blanding's Turtles, and specifically mapped the locations of all such areas.

The field visits were conducted in November and December of 2003, therefore we could not perform surveys for any of the rare wildlife species. We have not, to date, evaluated the site for the presence of Small Bur-reed. Based on extensive previous experience with most of the species, we were able to identify specific habitats likely to be used if any of the species are actually present. For the purpose of our assessment, we will assume that the species *are* present during the active season if suitable habitat exists.

3 - Potential Impacts

We determined that the installation of 4 of the 38 proposed poles may cause an impact to Wetland Rare Species Habitat (Figure 1). It should be noted that one of these poles, #35, is not in mapped "Estimated Habitat for Rare Wildlife." Additionally, we identified three small areas of Upland Rare Species Habitat (Figure 2), consisting of potential turtle nesting habitat that may be impacted by vehicles involved in the construction of the line.

Of the rare species identified as potentially being found at the site, the most likely to be impacted is the Four-toed Salamander. Potential wetland nesting micro-habitat for this species exists within proximity of all four of the aforementioned poles. Potential breeding habitat also exists for Blue-spotted Salamanders near two of the poles, however their most suitable breeding sites along the ROW will not be impacted by any of the construction. Minimal aquatic turtle habitat will be impacted, however direct harm may result to turtles migrating over land if work is conducted in nesting season.

3.1 Wetland Rare Species Habitat Areas

Installation of four of the proposed poles may cause an impact to wetland rare species habitat. Poles 8, 14, and 30 are all located within a wetland and in proximity to at least one potential Four-toed Salamander nest. Pole 35 is not located near any nesting habitat, but a shallow wetland containing potential nests must be crossed to install it. Below we describe these pole locations individually.

3.1.A - Pole 8

Description:

In this section of the project (Figure 3), the 23 kV line runs within a large cleared ROW parallel to a 345 kV line. At Pole 8, the 23 kV line veers eastward into an existing 23 kV ROW. Due to the change in direction of the line, the new Pole 8 will require guying. In order to minimize the impact to the area, "Manta Ray" anchors will be used to hold the pole in place. The pole location will be accessed by a roughly 100 foot long by 8-10 feet wide access pathway which will connect to the existing, dirt access road.

Rare Species Habitat:

Species Potentially Impacted: Four-toed Salamanders, Blue-spotted Salamanders, Spotted Turtles

This pole location is within a shallow, scrub/shrub and emergent wetland, containing numerous hummocks covered with *Sphagnum* moss. These conditions are ideal for nesting Four-toed Salamanders. Blue-spotted salamanders may also breed within the wetland, however we believe it unlikely due to the shallow, sparse nature of the standing water. Spotted turtles may also utilize this area as spring-time foraging habitat.

Potential Impact:

The temporary access pathway travels through Four-toed Salamander nesting micro-habitat; vehicles entering the site may cause some habitat degradation. No Blue-spotted Salamanders are likely to lay eggs in the path of the access route. The new pole itself is located within 5 feet of multiple potential nesting locations. Installation of the pole and associated guy wires may cause direct impact to Four-toed Salamander nesting and Spotted Turtle foraging habitat.

3.1.B - Pole 14

Description:

As shown in Figure 4, this site lies within a scrub/shrub wetland, consisting of an intermittent stream with minimal north to south flow. The existing access road that was used as a vehicle access pathway during 1998 maintenance of the existing 23 kV line traverses the stream in a defined 8 foot wide by 2-3 foot deep channel. The pole is located in the middle of the stream, and temporary matting will be placed within the channel to allow access to the new poles and to allow vehicles to cross over for access for poles to the east.

Rare Species Habitat:

Species Potentially Impacted: Four-toed Salamanders, Blue-spotted Salamanders, Spotted Turtles, Blanding's Turtles

This pole location also contains numerous hummocks covered with *Sphagnum* moss, ideal for nesting Four-toed Salamanders. Because of the minimal flow of the stream,

conditions may suitable for breeding Blue-spotted Salamanders. The stream likely supports fish however the intermittent and minimal flow might preclude the presence of Bridle Shiners. Blanding's and Spotted Turtles may forage within the wetland but in more vegetated areas away from the access channel and pole location.

Potential Impact:

The new pole itself is located greater than 25 feet from any potential Four-toed Salamander nesting locations, and its actual installation will not directly impact the micro-habitat. The installation of matting, however, will damage some of the potential nesting hummocks. The channel itself is devoid of shrubs or dead branches and may be less attractive to breeding Blue-spotted Salamanders than shrubbier parts located away from the area of impact.

3.1.C - Pole 30

Description:

This site (Figure 5) lies just within a scrub/shrub wetland, forming a connection between two areas of vernal pool habitat (the exact location of the certified pool is not known, however it appears that there are two separate parts of the pool connected by this shrubby wetland). The location of the new pole is outside of any vernal pool aquatic habitat. Access will be gained by an approximately 75 foot pathway connected to the existing access road.

Rare Species Habitat:

Species Potentially Impacted: Four-toed Salamanders

There are four small patches of *Sphagnum* moss, suitable for nesting Four-toed Salamanders, within 15 feet of the pole. During spring high water, this part of the wetland is not likely to be in water deep enough, if at all, to support breeding salamanders.

Potential Impact:

The pole itself is not located in vegetation suitable to breeding salamanders. The installation and vehicle use of the access pathway may cause a portion of the nesting micro-habitat to be damaged.

3.1.D - Pole 35

Description

This site lies within a scrub/shrub wetland, southeast of a small intermittent stream (Figure 6). Access to the pole will be gained by an existing access road, part of which

crosses a shallow (1-2 foot) section of standing water. Between the pole and the water crossing is an "upland island," topographically raised above the surrounding wetland.

Rare Species Habitat:

Species Potentially Impacted: Four-toed Salamanders, Blue-spotted Salamanders
(Note: This location is not within mapped "Estimated Habitat for Rare Wildlife," however we believe the habitat to be suitable for these rare species.)

The channel through the shallow standing water is bordered (mostly to the north) by numerous hummocks covered with *Sphagnum* moss, suitable for nesting Four-toed Salamanders. Because of the shallow standing water and minimal flow of the nearby intermittent stream, conditions may suitable for breeding Blue-spotted salamanders. The stream likely supports fish seasonally, however the intermittent and minimal flow might preclude the presence of Bridle Shiners.

Potential Impact:

The pole itself is not located near any potential salamander nesting micro-habitat. The access pathway crossing through the standing water may cause a portion of the salamander nesting habitat to be damaged.

3.2 - Upland Rare Species Habitat Areas

The upland habitat to be used for this project falls entirely within a cleared ROW. Therefore, there is no salamander terrestrial habitat to be impacted. Despite an abundance of exposed, bare ground that could be used for nesting by Spotted Turtles, and numerous soft, sandy patches suitable for nesting Blanding's Turtles, there were three major areas that stood out as more likely to be used by these turtles. We identify these nesting areas on Figure 2.

4 - Species-Specific Concerns

4.1 - Four-toed Salamanders

This species is vulnerable to direct disturbance in nesting habitat between mid-April and June. Adult females migrate from forested terrestrial habitat into wetland nesting habitat where they lay clusters of eggs within patches of *Sphagnum* moss. The females remain with the eggs until hatching, at which time they typically return to forested upland habitat. The larvae develop in shallow water beneath the nest, ultimately metamorphosing in July or August. Juvenile four-toed salamanders presumably migrate to forested terrestrial habitat and remain there until they reach reproductive maturity.

Critical Dates:

- Early April to late June: females will be on nests during this period.

4.2 - Blue-spotted salamanders

This species, like the Four-toed Salamander, primarily inhabits forested terrestrial habitat for the majority of the year. Adults migrate to temporary wetlands or vernal pools during a very brief period in early to mid-March. They lay egg masses within the wetlands, and return within a week or two to their preferred terrestrial habitat. The egg masses develop for four to six weeks and hatch in late April to early May. The larvae then develop within the wetlands until metamorphosis in early July. At this point, the juveniles migrate to forested terrestrial habitat within close proximity to the wetlands.

Critical Dates:

Adult females and males will be within wetlands for a brief period in March to early April.

- Egg masses are laid during this same time period, and develop until hatching in late April to early May.
- From late April or early May to metamorphosis in early July larvae are present in the wetlands.

In early July, larvae metamorphose into juveniles and migrate to upland habitat.

4.3 - Spotted and Blanding's Turtles

These turtles make use of the various wetland habitats for foraging during their active season between April and October. During this time, turtles may wander over land in search of foraging habitat or potential mates. Adult females leave wetland habitat in search of nesting locations during mid-June to mid-July. Both of the certified vernal pools provide suitable aquatic habitat for these species, particularly for Spotted Turtles. The actual locations of the small areas of impacted wetland habitat, however, offer minimal aquatic foraging habitat for these species.

4.4 - Bridle Shiners

There are no obvious ponds or perennial streams that will be directly impacted by the proposed line. The two intermittent streams, at poles 14 and 35, may have surface water connections to perennially flooded habitat for this species but within the ROW there does not appear to be suitable habitat.

4.5 - New England Bluet

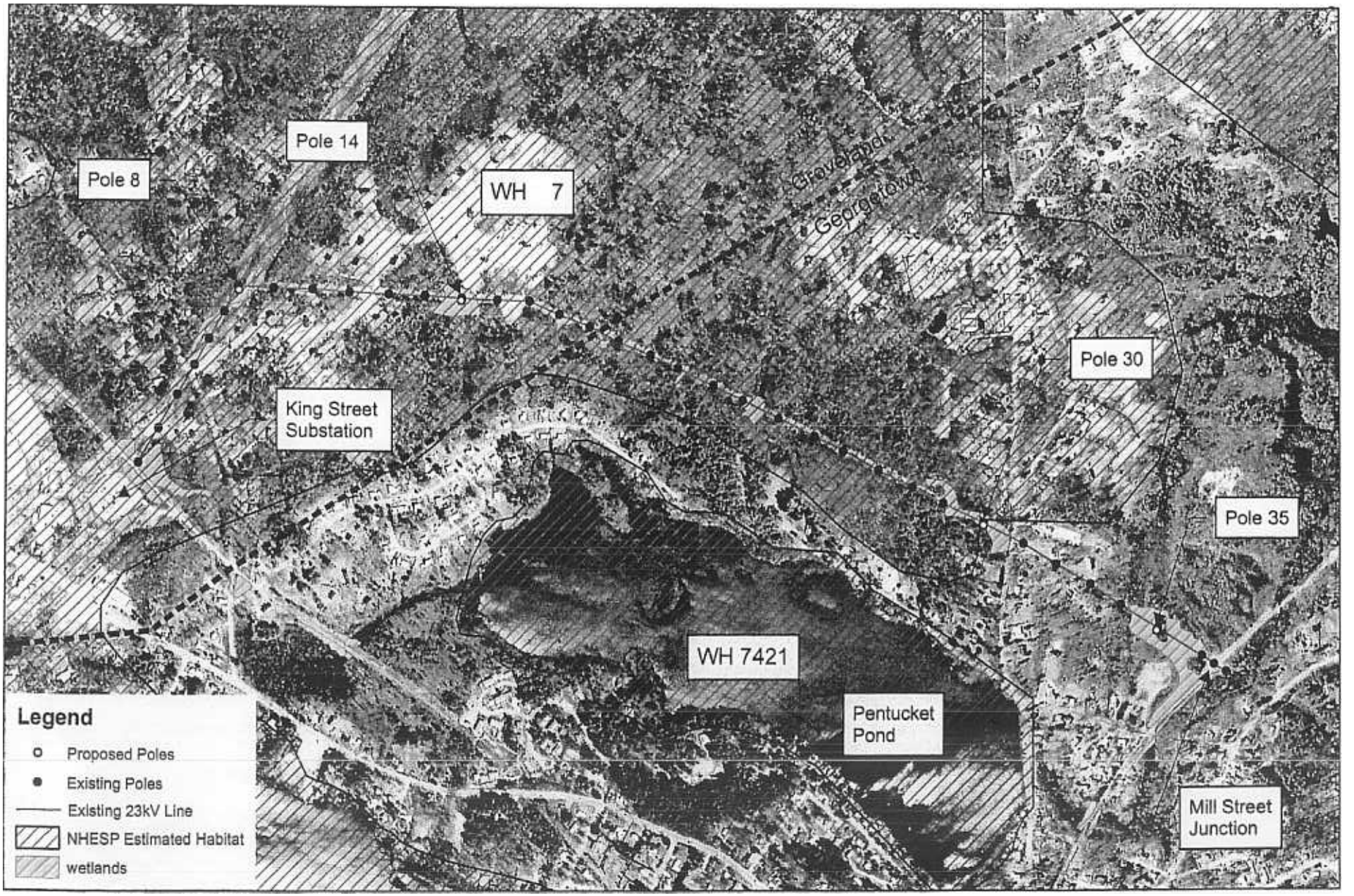
This species generally requires emergent herbaceous plant communities adjacent to permanent or semi-permanent ponds as oviposition habitat. The two certified vernal pools offer potentially suitable oviposition habitat for this species. There will be no impact to either of these pools, so threats to this species are minimal.

4.6 - Small Bur-reed

Although we have not evaluated the site specifically for the presence of small bur-reed, we noted that herbaceous emergent plant communities where *Sparganium* spp. populations typically occur are largely absent from the areas of proposed wetland impact.

Massachusetts Electric King Street to Mill Street 23kV Extension Project

Figure 1 - Areas of potential impact to wetland rare species habitat.



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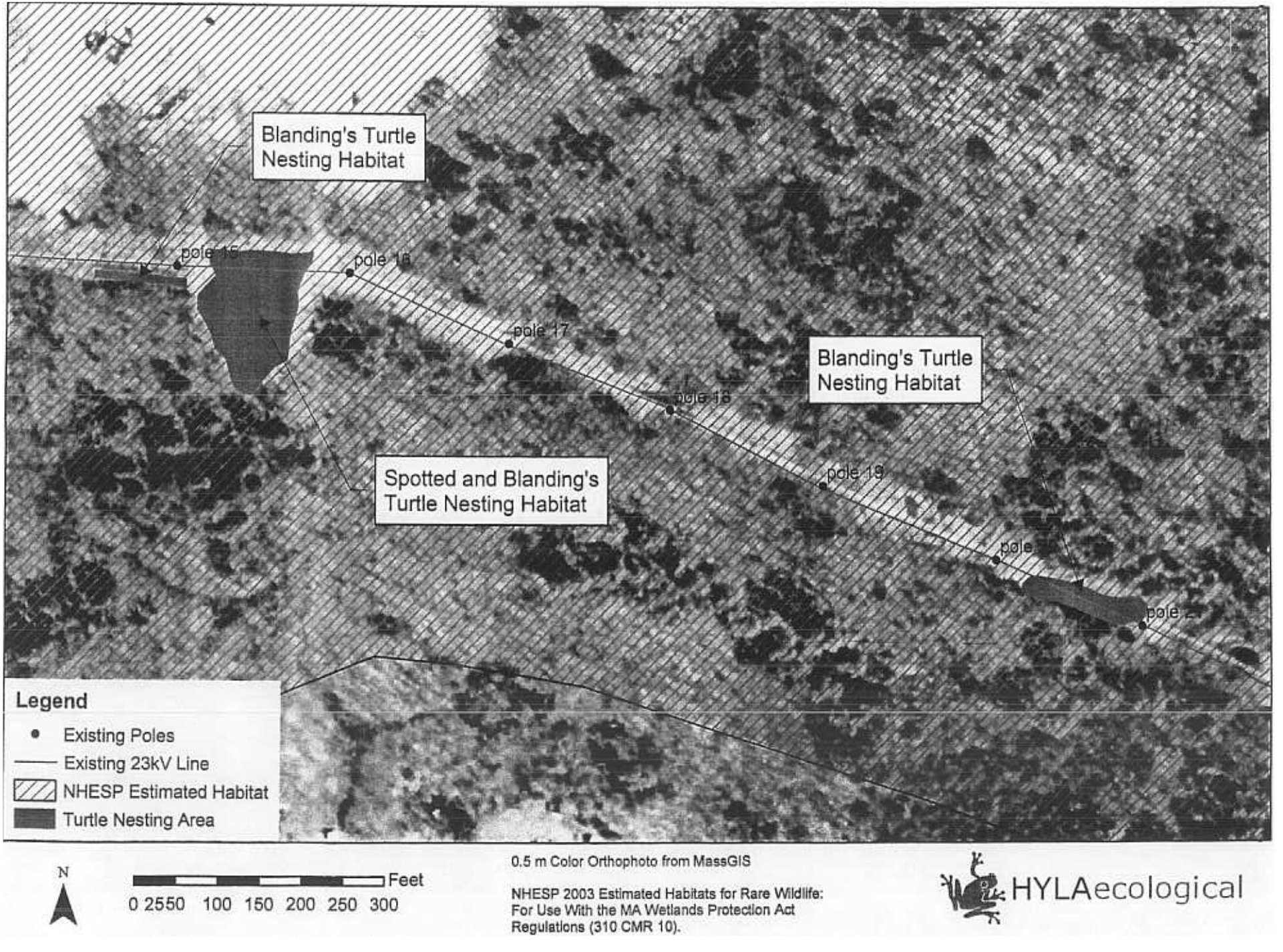
NHESP 2003 Estimated Habitats for Rare Wildlife: For Use With the MA Wetlands Protection Act Regulations (310 CMR 10).

HYLAecological

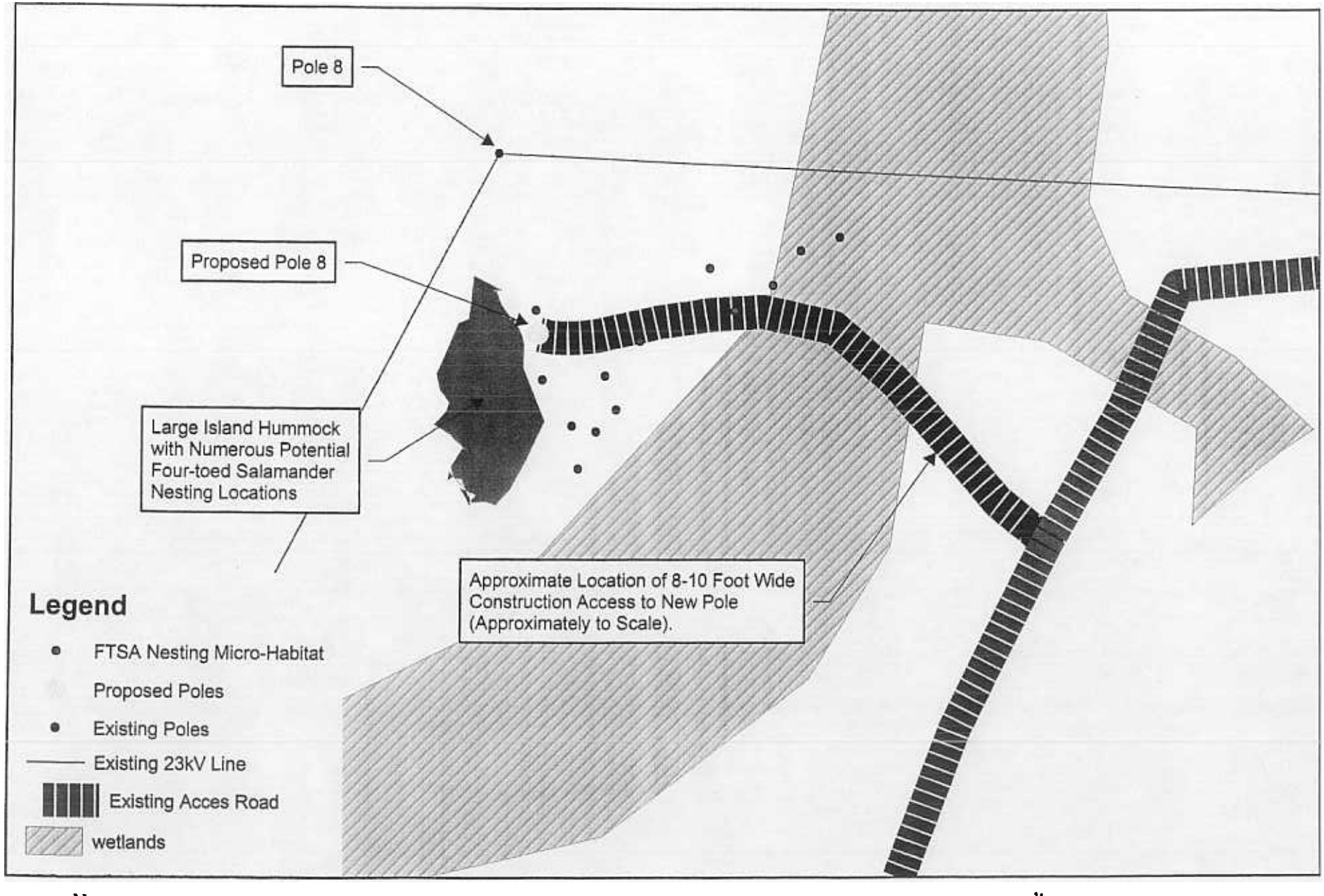
Massachusetts Electric King Street t[redacted]ill Street 23kV Extension Project

Figure 2 - Areas of potential impact to upland rare species habitat.



Massachusetts Electric King Stree[redacted] Mill Street 23kV Extension Project

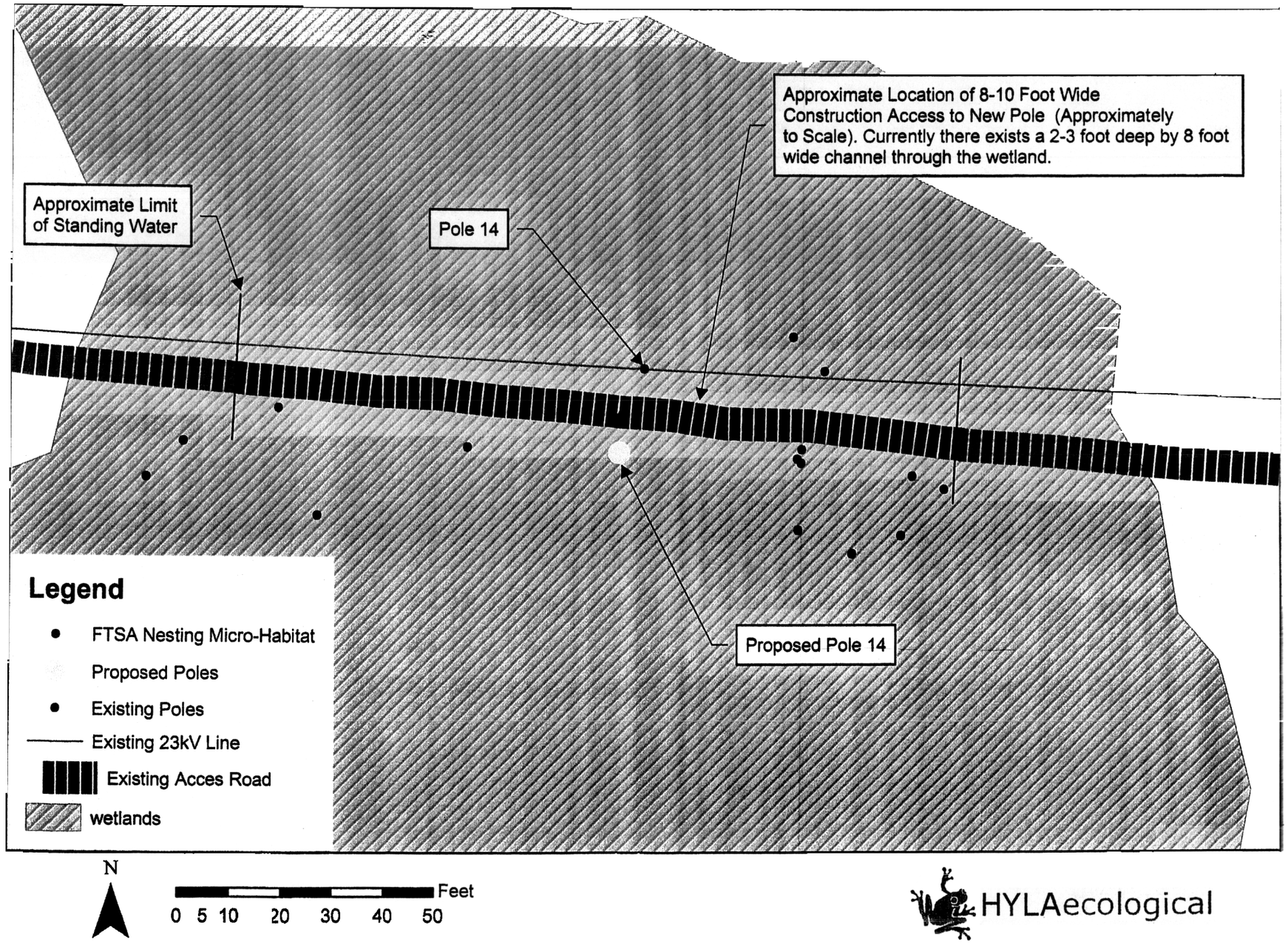
Figure 3 - Area of potential impact to wetland rare species habitat - Pole 8.



HYLAecological

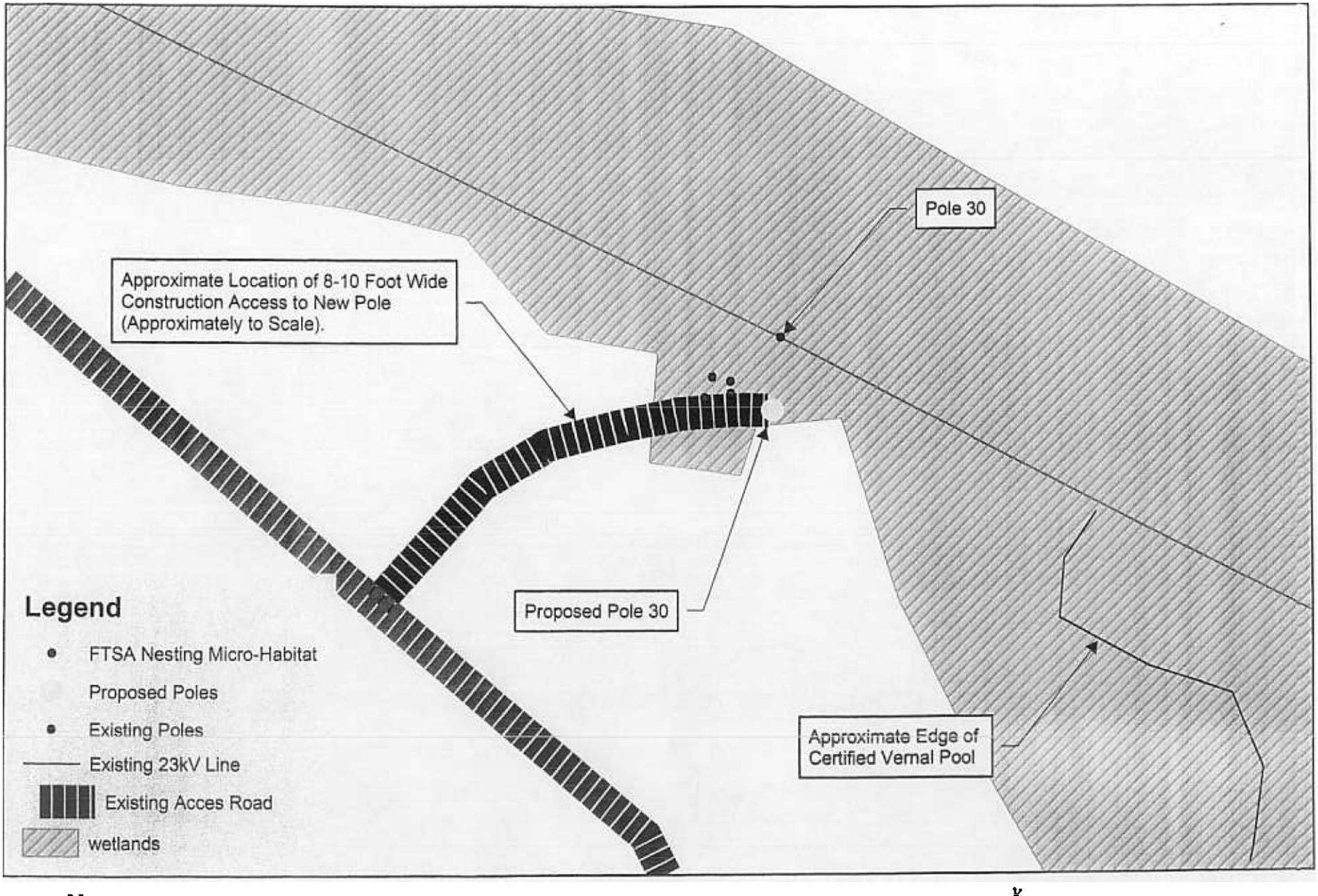
Massachusetts Electric King Street to Hill Street 23kV Extension Project

Figure 4 - Area of potential impact to wetland rare species habitat - Pole 14.



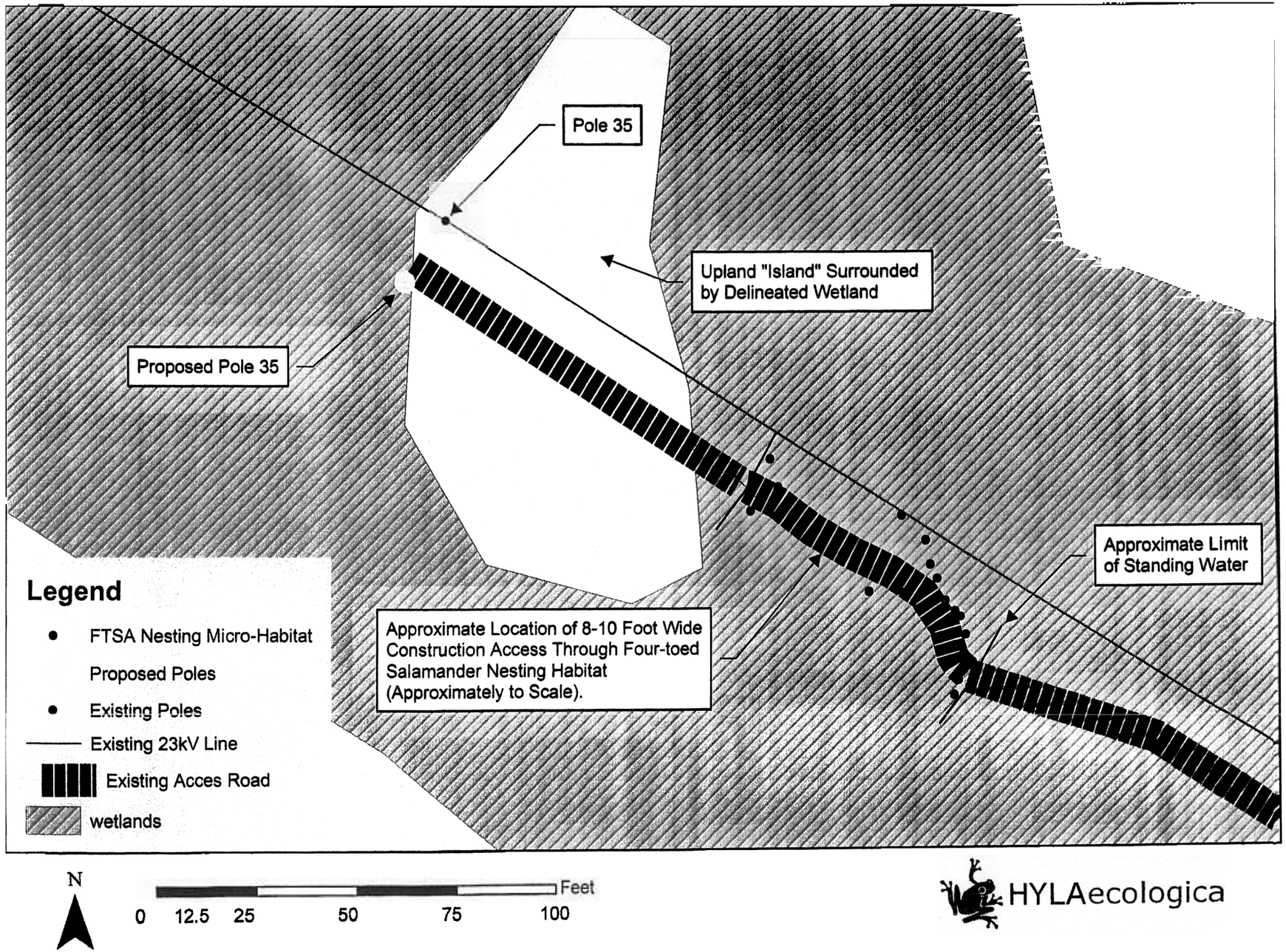
Massachusetts Electric King Street to Mill Street 23kV Extension Project

Figure 5 - Area of potential impact to wetland rare species habitat - Pole 30.



Massachusetts Electric King Street t[redacted]ill Street 23kV Extension Project

Figure 6 - Area of potential impact to wetland rare species habitat - Pole 35.



Massachusetts Electric Company
Second 23 kV Subtransmission Line
King Street (Groveland) to Mill Street (Georgetown)
Relative to
Natural Heritage & Endangered Species Program Issues

Introduction

On August 8, 2003, a letter was sent by National Grid on behalf of Massachusetts Electric Company (MEC) to the office of the MA Natural History & Endangered Species Program (NH&ESP) relative to a proposed second 23 kV line on the existing, cleared 23 kV, #2319 subtransmission line right-of-way (ROW) in Groveland and Georgetown. A response was received from NH&ESP dated October 31, 2003 (see Attachments A). The second subtransmission line will be constructed to meet existing demand for electrical supply and reliability. It is a public benefit project subject to a Public Convenience and Necessity filing with the Department of Telecommunications and Energy (DTE) as well as with the two local Conservation Commissions.

After receipt of the NH&ESP response, Massachusetts Electric Company (MEC), retained the services of Hyla Ecological Services to do a habitat reconnaissance of the existing 23 kV ROW, north of Pentucket Pond. That existing, cleared ROW between the King St Substation and the Mill Street Junction is about 1.6 miles in length. Hyla was charged with understanding the access and construction aspects of the second 23 kV line in light of the habitat to be traversed. To that task Hyla undertook three site visits. Their findings are reported in a report entitled "Rare Species Wildlife Habitat Assessment of the Proposed King Street to Mill Street Second 23 kV Line Project, Groveland and Georgetown, MA", dated December, 2003.

Due to the late-season timing of the NH&ESP response letter, species sampling to determine the prospect of a "taking" could not be done. Therefore, MEC felt it prudent, given the importance of completing the project for summer 2004 to ile an Environmental Notification Form (ENF) with the Massachusetts Environmental Policy Act (MEPA) unit.

Proposed Project Area

The project will take place in and adjacent to the substation and within the existing electric transmission right-of-way (ROW) from the substation to our Mill Street junction pole (on right-of-way near Mill Street in Georgetown). Land use adjacent to the substation consists of fill areas associated with the substation and various power line ROWs. Land use along the ROW consists of pasture, early successional upland areas, residential development, and scrub-shrub wetland. The right-of-way is shown on Figure 1.

Proposed Construction

The 2319 line will require the installation of 38 single wooden utility pole structures within the established transmission ROW. These pole will be placed approximately 20 feet south of the existing pole line. A hole the approximate diameter of the pole will be bored in the soil, the pole will be set in place, and the hole will be back-filled. Several, load carrying (usually angles), wood pole structures will be secured with guy-wires. Anchors (screw anchors in uplands and "manta rays" in wetlands) will be installed to secure the guy-wires. These anchors are minimally invasive because they do not require excavation; rather they are forced by pressure or rotation into the soils. The electrical conductors will be installed using conductor reel stands and tensioning equipment.

Access for wood pole installation and wiring will be obtained from the substation and from established access roads.

Construction is estimated to take 8 to 10 weeks.

Considerations Relative to Construction and Timing

MEC understands that the Program is charged with protecting the rare species of the Commonwealth and their associated habitats. MEC hopes that the Program also understands our mandate from the Commonwealth which is to deliver electric power as needed to its citizens in response to ongoing electrical demand and reliability studies, the "obligation to serve" requirement of the DTE.

For the proposed second 23 kV line project, MEC believes that both mandates can be met. MEC can have the second 23 kV line in service by June 2003 to meet summer loads and can do so without unduly affecting the potential habitat of the species in question.

Please consider the following facts associated with this project:

Routine pre-construction walkovers of the current construction area can be undertaken by Hyla scientists or other Hyla-trained scientists and records kept of findings and mitigative measures.

- The pole locations can be isolated with haybales upon approval of the Conservation Commissions. This might be done during the winter or later, if necessary, after the pole locations have been investigated and cleared by Hyla scientists.

The actual soil disturbance at each pole will be about 10 sq. ft. and the excavation will be by auger, unless precluded by rock.

- The area of WH 7/PH 17 is about 19 sq. mi., about 500,000,000 sq. ft. The area of direct soil disturbance associated with the second 23 kV pole placement is about 380 sq. ft. There will be secondary effects associated with access improvements, however, the access road exists.

- The construction will take about 8 to 10 weeks and move steadily along the ROW such that the area disturbed at any given pole location area will only be for a short period.

- If guying is needed, it will be by screw anchors in uplands and by "manta rays" in wetlands (neither method requires excavation).

- Tree removal will be minimal because the ROW had been cleared due to the existing 23 kV line.

- Access already exists and only grooming and cutting overly encroaching vegetation along the access is needed; cutting from the access to the new pole locations will occur.

- Mats will be used at wet crossings after the sites have been investigated and cleared by Hyla scientists. The shoulder of the access road can be lined at select locations to retard species movement temporarily during construction in the specific area.

- No work will be done at night, a prime salamander migratory period.

- With NH&ESP approval, egg masses can be moved from pole locations or to the side of the access road through wet areas.

  Most access is on the cleared ROW so that traffic is reduced in forested areas which contains blue-spotted salamander non-breeding habitat.

- Pole installation in areas that are critical can be skipped until more dry periods in May although access through such areas may be required.

- Routine pre-construction walkovers of the current construction area can be undertaken by Hyla scientists or other Hyla-trained scientists and records kept of findings and mitigative measures.

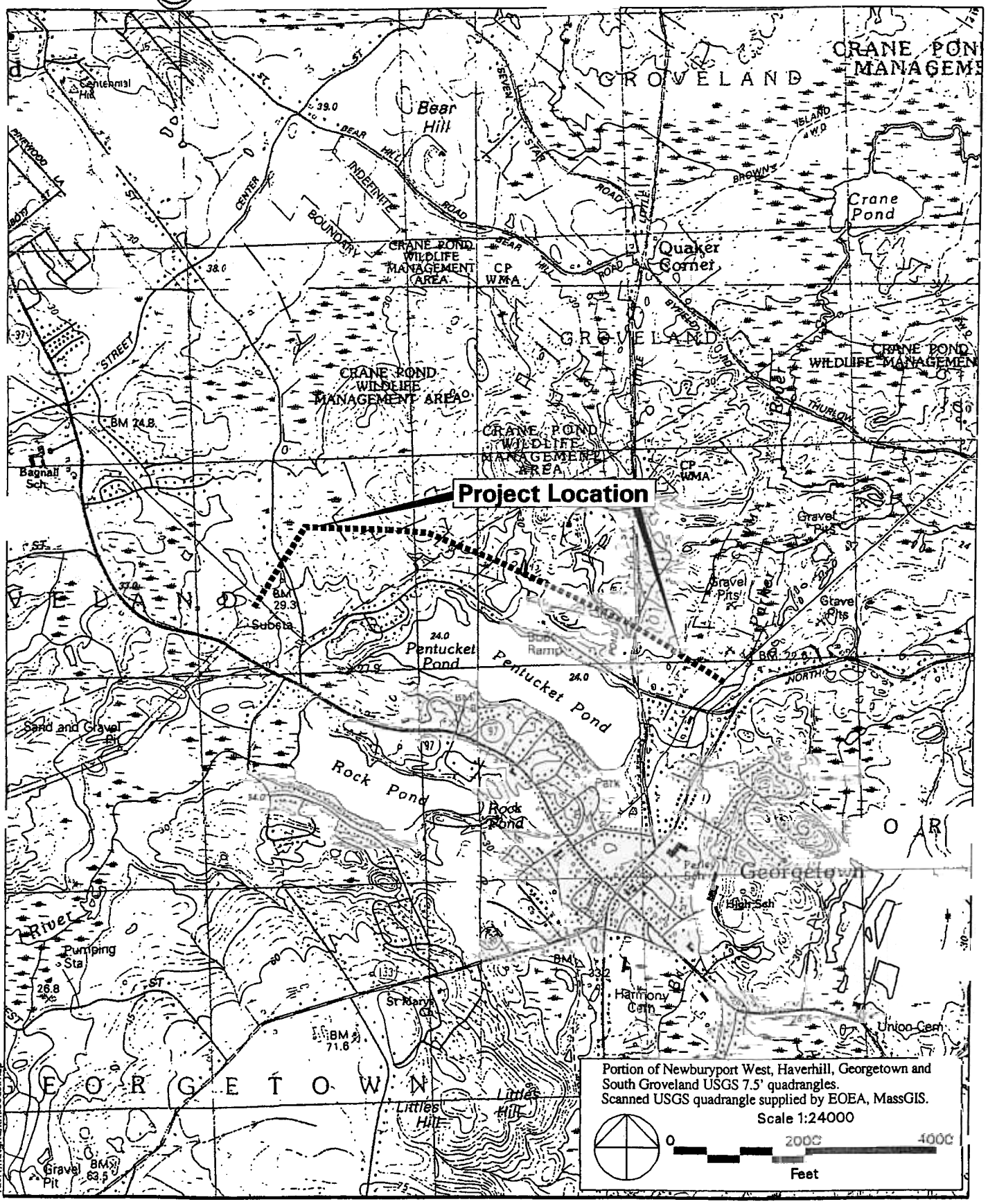
Requested Findings

It is MEC's hope that the combination of an extremely large mapped estimated/priority habitat area coupled with the very limited access and construction areas of this project will serve to minimize any affects on species or habitats. The construction window is very narrow to meet the summer 2004 peak but the construction period (8 to 10 weeks) is similarly very limited.

MEC will endeavor to keep rare species and crews at a practicable distance such that there is minimal conflict.

It is our hope that we can do this very limited construction project during the spring, 2004.

MEC would be pleased to entertain procedures proposed by staff that might aid in meeting our mutual public-interest goals.



Date: 02 Dec 03 11:58:05 Tuesday
/usr/natgrid/kmlocus.map

Figure 1
Site Locus Map